

Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com
Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com
EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148
Telephone: (702) 331-7593
Facsimile: (702) 331-1652

Kevin S. Sinclair, Nevada Bar Number 12277
ksinclair@sinclairbraun.com
SINCLAIR BRAUN LLP
16501 Ventura Boulevard, Suite 400
Encino, California 91436
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

Attorneys for Defendant
CHICAGO TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WELLS FARGO BANK, NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE
STRUCTURED ADJUSTABLE RATE
MORTGAGE LOAN TRUST, MORTGAGE
PASS-THROUGH CERTIFICATES
SERIES 2005-11.

Plaintiff,

VS.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00383-KJD-EJY

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 6] AND MOTION FOR FEES AND
COSTS [ECF No. 7]**

(First Request)

EARLY 28
SULLIVAN
WRIGHT
GIZER &
MCRAE LLP
ATTORNEYS AT LAW

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Wells Fargo Bank, National Association (“Wells Fargo”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On March 5, 2021, Wells Fargo filed its Complaint in the Eighth Judicial District Court, Case No. A-21-830602-C [ECF No. 1-1];
2. On March 7, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On April. 6, 2021, Wells Fargo filed a Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7];
4. Chicago Title’s deadline to respond to Wells Fargo’s Motion for Remand and Motion for Costs and Fees is April 20, 2021;
5. Chicago Title’s counsel is requesting an extension until May 20, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
6. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in Wells Fargo’s motions;
7. Wells Fargo does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wells Fargo's
2 Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended
3 through and including May 20, 2021.

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5 Dated: April 19, 2021

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
10 Attorneys for Defendant CHICAGO TITLE
11 INSURANCE COMPANY

12
13 Dated: April 19, 2021

SINCLAIR BRAUN LLP

14
15 By: /s/-Kevin S. Sinclair
16 KEVIN S. SINCLAIR
17 Attorneys for Defendant CHICAGO TITLE
18 INSURANCE COMPANY

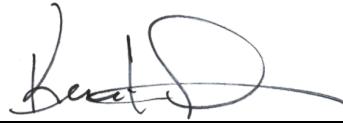
19
20 Dated: April 19, 2021

WRIGHT FINLAY & ZAK, LLP

21
22 By: /s/-Lindsay D. Robbins
23 LINDSAY D. ROBBINS
24 Attorneys for Plaintiff WELLS FARGO
25 BANK, NATIONAL ASSOCIATION

26
27 **IT IS SO ORDERED:**

28
29 Dated: 4/20/2021

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31 
32 By: Bena
33 UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ D'Metria Bolden
D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP